



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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November 30, 2020

**VIA ECF**

The Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007

**MEMO ENDORSED**

Re: Kathy Camacho, et. al. v. City of New York, et. al., 19 CV 11096 (DLC);  
Arisbel Gusman v. City of New York, et. al., 19 CV 11691 (DLC)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, representing defendants in the above-referenced matter. I write jointly with plaintiffs' counsel in both Camacho and Gusman to respectfully request that the discovery conference scheduled for Wednesday, December 2, 2020 at 2:00 p.m. be adjourned because video depositions of two of the Camacho plaintiffs are already scheduled for December 2, 2020, including the plaintiff Justine Rodriguez, at 2:00 p.m. that day. The parties have conferred and are available December 7, 2020 at 2:00 or later, or December 8 or 9 in the afternoons of those days, for the conference, should those dates and times be convenient for Your Honor.

This is the first request for an adjournment of the discovery conference.


Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman

Mark D. Zuckerman  
Senior Counsel

Granted. The conference will  
take place on December 7, 2020  
at 3:00pm.  
12.1.2020

  
DENISE COTE  
United States District Judge

cc: All Counsel (via ECF)